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September 10, 2021

By ECF

Hon. P. Kevin Castel
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: ***FCS Advisors, LLC v. Theia Group, Inc., et al., 21 Civ. 6995 (S.D.N.Y.)*** —
Request to Provisionally Redact and Seal Certain Limited Information

Dear Judge Castel:

We represent the defendant Theia Group, Inc. ("Theia") in the above case, and write to respectfully request permission to redact or seal, at least provisionally, certain limited information associated with the Theia's memorandum of law, the Reid Gorman affidavit, and exhibits that we will be filing imminently. Specifically, we would be sealing all or portions of Exhibits P, S, T, and U to the Reid affidavit. These documents consist primarily of internal and third party financial data that parties often and customarily seek to keep private.

Accordingly, we respectfully request the Court's permission to provisionally seal the four items referenced above. If it should please the Court, Theia will provide additional substantiation as to why the above-referenced documents should be sealed from public disclosure.

We thank the Court for its consideration of this request.

Respectfully,

/s/ Robin Henry
Robin Henry
Counsel for Theia Group, Inc.

cc: All Counsel of Record (via ECF)

The materials are provisionally sealed however within 14 days any party wishing to maintain a seal on the material shall demonstrate why the materials are not covered by the

presumption of public access and why the presumption (assuming it applies) has been overcome See Lugosh

Pyramid Co., 435 F.3d

110, 119-20.

SO ORDERED

[Signature]
USDJ
9-13-21